

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

_____)	
THE ESTATE OF YARON UNGAR, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 00-105L
)	
THE PALESTINIAN AUTHORITY, et al.,)	
)	
Defendants.)	
_____)	

**DEFENDANTS' MOTION FOR ENTRY OF A PROTECTIVE ORDER REGARDING
PLAINTIFFS' NOTICES OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)**

Defendants The Palestinian Authority ("PA") and The Palestine Liberation Organization ("PLO"), through counsel, respectfully move this Court pursuant to Federal Rule of Civil Procedure ("Rule") 26(c) to enter a protective order regarding the Rule 30(b)(6) Notices of Deposition served by Plaintiffs for the depositions of the PA and PLO. The notice served on the PA directs the PA to produce witnesses in Providence, Rhode Island on September 28 to testify on 132 topics, later narrowed to 126 topics. The notice served on the PLO makes a similar request but as to 114 topics, later narrowed to 108 topics.

For the reasons set forth in the accompanying Memorandum, which establish requisite good cause, Defendants request that the Court prohibit Plaintiffs from taking the depositions of the PA and the PLO pursuant to the 30(b)(6) deposition notices, or, in the alternative, limit Plaintiffs' notices to relevant, appropriate areas of inquiry, as delineated in the Memorandum.

FEDERAL RULE OF CIVIL PROCEDURE 26(c)(1) CERTIFICATION

Counsel for Defendants hereby certify that, as required by Fed. R. Civ. P. 26(c)(1), they have conferred with all parties or non-parties who may be affected by the relief sought in the

Motion in a good faith effort to resolve the issues raised in the Motion and have been unable to do so.

LOCAL RULE Cv 7(e) REQUEST FOR ORAL ARGUMENT

Pursuant to LR Cv 7(e), Defendants respectfully request oral argument on the issues raised in this Motion. Defendants estimate that an oral argument on this Motion will last approximately one hour. The Court has scheduled a hearing on three of the parties' other pending discovery-related motions for October 8, 2010.

Respectfully submitted,

Dated: September 27, 2010

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 27th day of September 2010, a true and genuine copy of the foregoing was filed by ECF, which will automatically send notification and a copy of such filing to:

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